

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

| | | |
|-------------------------------|---|----------------------|
| JEFFREY ALONZO SIMMS |) | |
| |) | |
| |) | |
| Plaintiff |) | C.A. No. 04-1205-SLR |
| |) | |
| v. |) | |
| |) | |
| HARRY M. FREEMAN, M.D., ET AL |) | JURY OF 12 DEMANDED |
| |) | |
| Defendants. |) | |

NOTICE OF RECORDS DEPOSITION

| | |
|--|---|
| TO: Jeffrey Alonzo Simms SBI #198625 Delaware Correctional Center 1181 Paddock Road Smyrna, DE 19977 | Department of Corrections Bureau Chief Joyce Talley 245 McKee Road Dover, DE 19904 |
|--|---|

PLEASE TAKE NOTICE that the undersigned will take the deposition *duces tecum* of the Records Custodian for Delaware Correctional Center relating to medical records of Jeffrey Alonzo Simms at the offices of McCullough & McKenty, P.A., 1225 N. King Street, Suite 1100, Wilmington, Delaware 19801, on Thursday, January 5, 2006, beginning at 2:00 p.m.: **Note: Personal appearance is waived if the materials are received in our office prior to the date of deposition.**

McCULLOUGH & MCKENTY, P.A.

/s/ Dana M. Spring

Daniel L. McKenty, Del. Bar No. 2689

Dana M. Spring, Del. Bar No. 4605

1225 N. King Street, Suite 1100

P.O. Box 397

Wilmington, DE 19899-0397

(302) 655-6749

Attorneys for Defendant Roberta F. Burns, M.D.

Dated: December 21, 2005

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DISTRICT OF DELAWARE

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| JEFFREY ALONZO SIMMS |) | |
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| Defendants. |) | |

CERTIFICATE OF SERVICE

I, **DANA M. SPRING**, hereby certify that on the 21st day of December, 2005, two (2) copies of the attached ***Notice of Records Deposition*** were sent to the following via first class mail, postage pre-paid:

Jeffrey Alonzo Simms
SBI #198625
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Department of Corrections
Bureau Chief Joyce Talley
245 McKee Road
Dover, DE 19904

McCULLOUGH & McKENTY, P.A.

/s/ Dana M. Spring

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Attorneys for Defendant Roberta F. Burns, M.D.